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Attorneys for Defendant:  
AERA ENERGY LLC

UNITED STATES DISTRICT COURT

**FOR THE EASTERN DISTRICT OF CALIFORNIA**

## BAKERSFIELD DIVISION

\* \* \*

AARON DICKERSON, as an individual and on behalf of all others similarly situated.

Case No. 1:21-CV-01384-JLT-BAK

[Removed from Case No. BCV-21-101646]

**JOINT STIPULATION TO REMAND  
ACTION TO STATE COURT;  
[PROPOSED] ORDER**

**Plaintiff,**

vs.

AERA ENERGY, LLC, a California limited liability company; and DOES 1 through 50, inclusive,

## Defendants.

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 This stipulation is made between Plaintiff Aaron Dickerson (“Plaintiff”) and  
3 Defendant Aera Energy, LLC (“Defendant”) (collectively, the “Parties”), through their  
4 undersigned attorneys of record, and pursuant to Civil Local Rule 143.

5 1. WHEREAS, Plaintiff filed his civil claims against Defendant in Kern County  
6 Superior Court on July 20, 2021;

7 2. WHEREAS, Plaintiff filed a First Amended Complaint in Kern County Superior  
8 Court on August 13, 2021;

9 3. WHEREAS, Plaintiff filed a Second Amended Complaint in Kern County  
10 Superior Court on September 13, 2021;

11 4. WHEREAS, Defendant removed the Action to United States District Court,  
12 Eastern District of California – Bakersfield Division on September 16, 2021;

13 5. WHEREAS, the Parties participated in an initial mediation session under the  
14 supervision of mediator Scott Markus, Esq. on March 17, 2022, and a second mediation session  
15 with Mr. Markus on July 1, 2022;

16 6. WHEREAS, during the course of the mediation sessions, the Parties discussed at  
17 length the propriety of Defendant’s removal of the case;

18 7. WHEREAS, in the days following the second mediation session, the Parties  
19 continued their settlement negotiations through Mr. Markus and reached a settlement of all  
20 claims in this Action, have executed a Memorandum of Understanding encompassing the main  
21 provisions of the settlement and are in the process of drafting a long-form settlement agreement;

22 NOW THEREFORE, it is hereby stipulated and agreed by and between the Parties to the  
23 above-entitled Action through their respective attorneys of record that:

24 1. Pursuant to the Memorandum of Understanding between the Parties and this  
25 Stipulation, the Parties stipulate that the Court should remand this Action to state court for the  
26 purposes of settlement only; and

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1       2.     In the event the settlement does not become final for any reason, this Stipulation  
2 will be void *ab initio* and the Parties will have the right to further contest whether removal and/or  
3 remand of this Action is appropriate.

5 | DATED: September 6, 2022 Respectfully Submitted,

SUTTON HAGUE LAW CORPORATION, P.C.

By: /s/ - Jared Hague.  
S. BRETT SUTTON  
JARED HAGUE  
Attorneys for Plaintiff  
AARON DICKERSON

11 | DATED: September 6, 2022 Respectfully Submitted,

## MITCHELL SILBERBERG & KNUPP, LLC.

By:   /s/ - Jeremy Mittman  
ADAM LEVIN  
JEREMY MITTMAN  
GABRIEL HEMPHILL  
Attorneys for Defendant  
AERA ENERGY, LLC

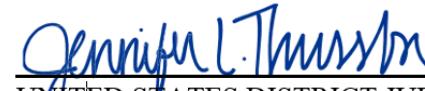
1 **[PROPOSED] ORDER**

2 Pursuant to the joint stipulation to remand the above-captioned action to state court, and  
3 for good cause shown, the above-captioned action is remanded to the Superior Court of the State  
4 of California for the County of Kern as *Aaron Dickerson v. Aera Energy, LLC*, Case No. BCV-  
5 21-101646, in light of the Parties' agreement to settle this action.

6 In the event the settlement does not become final for any reason, this stipulation and  
7 order will be void *ab initio* and Defendant will have the right to further contest whether removal  
8 and/or remand of this action is appropriate.

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10 IT IS SO ORDERED.

11 Dated: September 13, 2022

  
12 Jennifer L. Thurston  
13 UNITED STATES DISTRICT JUDGE

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